

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

CYBERFONE SYSTEMS, LLC (formerly)	
LVL PATENT GROUP, LLC),)	
)	
Plaintiff,)	
)	C.A. No. 11-834 (SLR)
v.)	
)	
FEDERAL EXPRESS CORPORATION;)	
UNITED PARCEL SERVICE, INC.; DHL)	
EXPRESS (USA), INC.; MOTOROLA)	
SOLUTIONS, INC.; GARMIN USA, INC. ;)	
MITAC DIGITAL,)	
CORPORATION, VERIFONE SYSTEMS,)	
INC.; HYPERCOM CORPORATION;)	
HYPERCOM U.S.A., INC., EQUINOX)	
PAYMENTS, LLC; INGENICO CORP.;)	
INGENICO INC.; FIRST DATA)	
CORPORATION; DELTA AIR LINES, INC.;)	
UNITED AIR LINES, INC.; SOUTHWEST)	
AIRLINES CO.; AMERICAN AIRLINES,)	
INC.; US AIRWAYS, INC.; AIR CANADA;)	
AIRTRAN AIRWAYS, INC.; JETBLUE)	
AIRWAYS CORPORATION; MARRIOTT)	
INTERNATIONAL, INC.; STARWOOD)	
HOTELS & RESORTS WORLDWIDE, INC.;)	
INTER-CONTINENTAL HOTELS)	
CORPORATION; HYATT CORPORATION;)	
HILTON WORLDWIDE, INC.;)	
AMAZON.COM, INC.; PANDIGITAL, INC.;)	
BARNES & NOBLE, INC.; SONY)	
ELECTRONICS INC.; AND NINTENDO OF)	
AMERICA INC.,)	

Defendants.

**UNOPPOSED MOTION TO EXTEND TIME TO
ANSWER OR OTHERWISE RESPOND TO FIRST AMENDED COMPLAINT**

WHEREAS, CyberFone Systems, LLC, (“CyberFone”) filed the Complaint on September 15, 2011. After service of summonses, the Defendants had varying response dates. Most or all of the Defendants requested and received extensions of the response dates; and

WHEREAS, CyberFone filed its First Amended Complaint on December 8, 2011. Under Fed. R. Civ. P. 15, the Defendants once again have varying response dates to the First Amended Complaint. Some Defendants have requested extensions of those dates;

WHEREAS the First Amended Complaint added certain new defendants to the action;

WHEREAS these and other defendants have not yet been served or have only recently been served with the First Amended Complaint, and reserve the right to seek additional extensions; WHEREAS, the parties have conferred and agreed to extend response and answer deadlines to the First Amended Complaint as set forth below and Defendants do not oppose this motion;

NOW, THEREFORE, on behalf of all the parties, pursuant to Fed. R. Civ. P.6 (b) and 15, CyberFone moves the Court as follows:

1. That the date by which any Defendant shall move or file a response to the First Amended Complaint other than an Answer shall be the later of January 13, 2012 or the otherwise applicable deadline of the Federal Rules of Civil Procedure; and

2. That the date by which any Defendant shall file an Answer (including counterclaims, if applicable) to the First Amended Complaint shall be the later of January 23, 2012 or the otherwise applicable deadline of the Federal Rules of Civil Procedure.

<p>OFCOUNSEL: Bruce D. Kuyper Marc A. Fenster Frederika Ung RUSS, AUGUST & KABAT 12424 Wilshire Boulevard, 12th Floor Los Angeles, CA 90025-1031 (301)826-7474</p>	<p>PARKOWSKI & GUERKE, P.A. <u>/s/ John C. Andrade</u> JOHN C. ANDRADE, ESQUIRE 116 W. Water Street P.O. Box 598 Dover, DE 19903 302-678-3262 <i>Attorneys for Plaintiff</i></p>
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IT IS SO ORDERED this ____ day of _____, 2011.

The Honorable Sue L. Robinson
United States District Judge

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CERTIFICATE OF SERVICE

I, John C. Andrade, hereby certify that on December 22, 2011, the attached document was electronically filed with the Clerk of the Court using CM/ECF which will send notification to the registered attorney(s) of record that the document has been filed and is available for viewing and downloading.

I further certify that on December 22, 2011, the attached document was electronically mailed to the following:

Monica V. Bhattacharyya

Lawrence B. Goodwin

Jonathan D. Olinger

Stefan R. Stoyanov

Jeffrey J. Toney

Jonathan K. Waldrop

mbhattacharyya@kasowitz.com

lgoodwin@kasowitz.com

jolinger@kasowitz.com

sstoyanov@kasowitz.com

jtoney@kasowitz.com

jwaldrop@kasowitz.com

Pro Hac Vice Attorneys for Defendant, Delta Air Lines, Inc.

Jack B. Blumenfeld

Karen Jacobs Loudon

Morris, Nichols, Arsht & Tunnell LLP

jblumenfeld@mnat.com

kloudon@mnat.com

*Attorneys for Defendants, Ingenico Corporation, Ingenico Inc.
and United Parcel Service, Inc.,*

Jack B. Blumenfeld

Morris, Nichols, Arsht & Tunnell LLP

jblumenfeld@mnat.com

*Attorneys for Defendants, Verifone Systems, Inc., United Airlines, Inc.
Hypercom Corporation, US Airways, Inc. and AirCanada*

Karen Jacobs Louden

Morris, Nichols, Arsht & Tunnell LLP

klouden@mnat.com

Attorneys for Defendants, Motorola Mobility Inc. and Hilton Worldwide Inc.

Frederick L. Cottrell, III

Anne Shea Gaza

Travis Steven Hunter

Richards, Layton & Finger, PA

cottrell@rlf.com

gaza@rlf.com

hunter@rlf.com

Attorneys for Defendant Marriott International Inc.

John G. Day

Ashby & Geddes

jday@ashby-geddes.com

Attorneys for Defendant JetBlue Airways Corporation

Jordan A. Sigale

Loeb & Loeb LLP

jsigale@loeb.com

Pro Hac Vice Attorney for Defendant JetBlue Airways Corporation

Darren E. Donnelly

J. David Hadden

Ryan J. Marton

Saina S. Shamilov

ddonnelly@fenwick.com

dhadden@fenwick.com

rmarton@fenwick.com

sshamilov@fenwick.com

Pro Hac Vice Attorneys for Defendant, Amazon.com Inc.

Brian Erickson

Aaron Fountain

John Guaragna

Aleine Michelle Porterfield

brian.erickson@dlapiper.com

aaron.fountain@dlapiper.com

john.guaragna@dlapiper.com

aleine.porterfield@dlapiper.com

Pro Hac Vice Attorneys for Defendant Starwood Hotels & Resorts Worldwide Inc.

Joseph S. Hanasz

David P. Lindner

Laura B. Miller

jhanasz@brinkshofer.com

dlindner@brinkshofer.com

lmiller@brinkshofer.com

Pro Hac Vice Attorney for Defendant, Hyatt Hotels Corporation

Richard L. Horwitz

David Ellis Moore

Potter Anderson & Corroon, LLP

rhowitz@potteranderson.com

dmoore@potteranderson.com

Attorneys for Defendant, Delta Air Lines Inc. and Amazon.com Inc.

Denise Seastone Kraft

DLA Piper LLP

denise.kraft@dlapiper.com

Attorneys for Defendant Starwood Hotels & Resorts Worldwide Inc.

Eve H. Ormerod

Gregory Erich Stuhlman

Kimberly A. Warshawsky

Greenberg Traurig, LLC

ormerode@gtlaw.com

stuhlmang@gtlaw.com

warshawskyk@gtlaw.com

Attorneys for Defendant, DHL Express (USA) Inc.

Lauren Murphy Pringle

Fish & Richardson, P.C.

pringle@fr.com

*Attorneys for Defendants Barnes & Noble Inc.
and Federal Express Corporation*

Philip A. Rovner

Potter Anderson & Corroon, LLP

provner@potteranderson.com

Attorneys for Defendant, First Data Corporation

Rodger Dallery Smith, II

Morris, Nichols, Arsht & Tunnell LLP

rdsefiling@mnat.com

Attorneys for Defendant, Sony Electronics Inc.

Chad S.C. Stover

Connolly, Bove, Lodge & Hutz

cstover@cblh.com

Attorneys for Defendant American Airlines, Inc.

Bradley W. Caldwell

Holly E. Engelmann

bcaldwell@mckoolsmith.com

hengelmann@mckoolsmith.com

Pro Hac Vice Attorneys for Defendant American Airlines, Inc.

Gregory Brian Williams

Fox Rothschild LLP

gwilliams@foxrothschild.com

Attorneys for Defendant, Hyatt Hotels Corporation

John P. Fry

Kelly L. Whitehart

Morris, Manning & Martin, LLP

jfry@mmmlaw.com

klw@mmmlaw.com

Pro Hac Vice Attorneys for Ingenico Corporation,

Ingenico Inc. and United Parcels Services, Inc.

Stephen E. Baskin

John C. Alemanni

Kilpatrick Townsend & Stockton LLP

sbaskin@kilpatricktownsend.com

jalemanni@kilpatricktownsend.com

Pro Hac Vice Attorneys for Defendants Air Canada, United Airlines, Inc.

And US Airways, Inc.

Gregory E. Stuhlman

Greenberg Traurig, LLP

sthulmang@gtlaw.com

Attorneys for Defendant Garmin USA, Inc.

Owen W. Dukelow

Kolisch Hartwell, P.C.

dukelow@khpatent.com

Pro Hac Vice Attorneys for Defendants Verifone Systems, Inc.

and Hypercom Corporation

Timothy S. Teter

Ben Damstedt

Cooley LLP

teterts@cooley.com

bdamstedt@cooley.com

*Pro Hac Vice Attorneys for Defendant, Nintendo
Of America, Inc.*

Christopher Kao

Bobbie Wilson

Perkins Coie LLP

CKao@perkinscoie.com

BWilson@perkinscoie.com

*Pro Hac Vice Attorneys for Defendant First Data
Corporation*

PARKOWSKI, GUERKE & SWAYZE, P.A.

By: /s/ John C. Andrade

JOHN C. ANDRADE, ESQUIRE

116 W. Water Street

P.O. Box 598

Dover, DE 19903

302-678-3262

Attorneys for Plaintiff